

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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IN RE: DEALER MANAGEMENT  
SYSTEMS ANTITRUST LITIGATION

MDL No. 2817  
Case No. 18 C 864

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This Document Relates to All Cases

Hon. Robert M. Dow, Jr.

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**MDL PLAINTIFFS' MOTION TO SEAL THEIR OPPOSITION AND  
ACCOMPANYING EXHIBIT TO CDK GLOBAL, LLC'S MOTION  
FOR A PROTECTIVE ORDER**

MDL Plaintiffs respectfully requests leave to file under seal their Opposition and Accompanying Exhibit 1 to Defendant CDK Global, LLC's ("CDK") Motion For a Protective Order. The Opposition and Exhibit 1 include information from documents that CDK has designated as "Confidential" or "Highly Confidential," and the MDL Plaintiffs' therefore seek leave to file them under seal. MDL Plaintiffs will also file a public, redacted version of the Opposition.

MDL Plaintiffs file this motion without prejudice to their ability challenge CDK's improper use of the Confidential and Highly Confidential designations for documents that are not proprietary and do not contain trade secrets.

Dated: June 15, 2018

Respectfully submitted,

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth

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**CERTIFICATE OF SERVICE**

I, Derek T. Ho, an attorney, hereby certify that on June 15, 2018, I caused a true and correct copy of the foregoing **MDL PLAINTIFFS' MOTION TO SEAL THEIR OPPOSITION AND ACCOMPANYING EXHIBIT TO CDK GLOBAL, LLC'S MOTION FOR A PROTECTIVE ORDER** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Derek T. Ho

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